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6 BEFORE THE WASHINGTON STATE  
7 OFFICE OF THE INSURANCE COMMISSIONER  
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9 In the Matter of the Application regarding the  
10 Conversion and Acquisition of Control of  
Premera Blue Cross and its Affiliates,

No. G02-45

11  
12 DECLARATION OF ELEANOR  
HAMBURGER

13 Washington Citizen Action, Welfare Rights  
14 Organizing Coalition, American Lung  
15 Association of Washington, Northwest  
16 Federation of Community Organizations,  
17 Northwest Health Law Advocates, Service  
Employees International Union Washington  
State Council, The Children's Alliance,  
Washington Academy of Family Physicians,  
Washington Association of Churches,  
Washington Protection and Advocacy System  
and Washington State NOW,

18 Washington State Medical Association,

19 Washington State Hospital Association, and  
20 Association of Washington State Public  
Hospital Districts

21 Applicants for Intervention.  
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DECLARATION OF ELEANOR HAMBURGER

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Columbia Legal Services  
101 Yesler Way, Suite 300  
Seattle, WA 98104  
(206) 464-5933

1 I, Eleanor Hamburger, declare:

- 2 1. I am co-counsel for the Welfare Rights Organizing Coalition (WROC), one of the  
3 Applicant-Intervenors.
- 4 2. On November 22, 2002, as a result of my request for information from the Office of  
5 the Insurance Commissioner under the Public Disclosure Act, chapter 42.17 RCW, I  
6 received a faxed copy of a letter dated November 1, 2002 from Yori Milo, Executive  
7 Vice President and Chief Legal and Public Policy Officer, and John P. Domeika,  
8 Senior Vice President and General Counsel for Premera to Deputy Insurance  
9 Commissioner James T. Odiorne and an proposed stipulation and order, drafted by  
10 Premera Blue Cross. This letter appears to be the letter referenced in Premera's  
11 Motion for Partial Reconsideration and Clarification at 3.
- 12 3. Attached as Exhibit 1 is a true and correct copy of the letter and proposed stipulation  
13 and order.

14 I certify and declare under penalty of perjury under the laws of the State of Washington  
15 that the foregoing is true and correct.

16 DATED this \_\_\_\_ day of November, 2002 in Seattle, Washington.

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19 ELEANOR HAMBURGER, WSBA No. 26478  
20 Of Attorneys for Applicant-Intervenor Welfare Rights  
Organizing Coalition